

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re	)	Chapter 11
	)	
FTX TRADING LTD., et al.,	)	Case No. 22-11068 (JTD)
	)	Jointly Administered
	)	
Debtors.	)	<b>Objection Deadline: February 19, 2025 at 4:00 p.m.</b>
	)	<b>Hearing Date: April 17, 2025 at 10:00 a.m.</b>
	)	
	)	<b>Related Docket No. 29461</b>

**MOTION FOR AUTHORIZATION TO FILE UNDER SEAL PORTIONS  
OF THE REQUEST OF ASTTERIA (HK) LIMITED FOR ALLOWANCE AND  
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO  
11 U.S.C. § 503(b)(1)(A) AND EXHIBITS A THROUGH E THERETO**

Astteria (HK) Limited (“Astteria”), by and through undersigned counsel, respectfully submits this motion (the “Motion to Seal”), pursuant to section 107(b) of the Bankruptcy Code, Fed. R. Bankr. Pro. 9018, and Del. Bankr. L.R. 9018-1, seeking entry of an Order authorizing it to file under seal portions of the *Request of Astteria (HK) Limited for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A)* [DI 29461] (the “Administrative Expense Claim”) and Exhibits A through E thereto. In support of this Motion to Seal, Astteria respectfully states as follows:

**JURISDICTION**

1. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. §§ 1408 and 1409(a). Local 705 Pension Fund confirms its consent pursuant to Del. Bankr. L. R. 9013-1(f) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. The statutory predicates for the relief requested herein are Bankruptcy Code sections 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1(b).

**RELIEF REQUESTED**

3. Astteria filed the Administrative Expense Claim on January 31, 2025. Portions of the Administrative Expense Claim and Exhibits A through E thereto are documents Astteria believes are confidential. Astteria files this Motion to Seal requesting that the Court grant it permission to file portions of the Administrative Expenses Claim and Exhibits A through E thereto under seal.

**BASIS FOR RELIEF REQUESTED**

4. Section 107(b) of the Bankruptcy Code provides this Court with the authority to issue orders that will protect entities from potential harm that may result from the disclosure of certain information. The section provides, in relevant part:

(b) On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may –

(1) protect an entity with respect to a trade secret or confidential research, development, or commercial information....

11 U.S.C. § 107(b). Fed. R. Bankr. P. 9018 sets forth the procedures by which a party may move for relief under section 107(b), providing that “[o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information....” Del. Bankr. P. L. Rule 9018-1(b) additionally provides, in relevant part, that “[a]ny party who seeks to file documents under seal must file a motion to that effect.”

5. As set forth above, portions of the Administrative Expense Claim and Exhibits A through E are documents that Astteria believes may be subject to Astteria's and the Debtors'

confidentiality rights as well as the confidentiality rights of third parties. Specifically, the redacted portions of the Administrative Expense Claim contain wallet numbers and other sensitive information identifying information. Accordingly, Astteria submits that cause exists to grant its request to seal and respectfully requests the entry of an order permitting it to file portions of the Administrative Expenses Claim and Exhibits A through E thereto under seal.

**Compliance with Local Rule 9018-1(d)**

6. To the best of the knowledge, information, and belief of the undersigned counsel to Astteria, the portions of the Administrative Expenses Claim and Exhibit A through E thereto that Astteria is requesting to seal pursuant to the relief requested in this Motion contains information that may be subject to the Debtors' Confidentiality Rights (each as defined in Local Rule 9018-1(d)(iii)). Prior to filing this Motion, counsel to Astteria sent two emails to counsel for the Debtors regarding the relief requested herein and asked whether the Debtor's requested that other portions of the Administrative Expenses Claim should be redacted. Debtors' counsel did not respond to either of the emails.

**CONCLUSION**

WHEREFORE, Astteria respectfully requests that the Court enter an Order substantially in the form attached hereto as **Exhibit A** granting it authority to file portions of the Administrative Expenses Claim and Exhibits A through E thereto, under seal and granting such other and further relief as the Court may deem just and proper.

Date: February 5, 2025  
Wilmington, DE

**SULLIVAN • HAZELTINE • ALLINSON LLC**

/s/ William A. Hazeltine  
William A. Hazeltine (No. 3294)  
919 North Market Street, Suite 420  
Wilmington, DE 19801  
Tel: (302) 428-8191  
Fax: (302) 428-8195  
Email: [whazeltine@sha-llc.com](mailto:whazeltine@sha-llc.com)

*Attorneys for Astteria (HK) Limited*